

December 2, 2004

California Energy Commission
Dockets Office
Attn: Docket No. 04-IEP-01
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

To Whom It May Concern:

Enclosed herewith are comments submitted in response to the CEC staff paper titled *Proposal to Access Supply, Resource and Bulk Transmission Planning Data* released November 2004. These comments were also submitted electronically at docket@energy.state.ca.us on December 2, 2004.

If any additional attention is required concerning this matter, please contact Mr. Alvin Chan at (213) 367-4208.

Sincerely,

Randy Howard
Executive Assistant to the General Manager-
Power

**STATE OF CALIFORNIA
ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION**

In the Matter of:)	
)	
Integrated Energy Policy)	
Report (IEPR) Update:)	Docket No. 04-IEP-01
)	
Proposal to Access)	
Electricity Supply,)	
Resource, and)	
Bulk Transmission)	
Planning Data)	

Comments of the Los Angeles Department of Water and Power
on the November 2004 CEC staff report:
*Proposal to Access Electricity Supply, Resource, and
Bulk Transmission Planning Data*

Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to offer the following comments regarding the California Energy Commission's Staff Paper: "Proposal to Access Electricity Supply, Resource and Bulk Transmission Planning Data", released November 2004.

LADWP fully recognizes and supports the California Energy Commission's responsibility for gathering relevant information to develop the '2005 Integrated Energy Policy Report' pursuant to Public Resource Code (PRC) Chapter 4 (Integrated Energy Policy Reporting) and Section 25324.

As one of four unique control areas in California, LADWP differs from the California Independent System Operator (CAISO) in the approach necessary to manage resources required to serve its load. LADWP is the largest, vertically integrated electric utility in the State, and thus has developed planning accordingly. LADWP welcomes the opportunity to share the most current results of its resource and transmission planning which are developed from experience gained over decades of successfully delivering reliable electricity to the citizens of Los Angeles by providing for prudent power reserves and robust transmission capacity. Further, LADWP benefits from seamless planning and implementation of its resources and transmission facilities.

Each control area within the State has a different approach to managing its resources in order to meet its respective load requirements. A standardized 'one size fits all' approach to data collection ignores the need for a collaborative approach that will recognize and accommodate for the difference in the type of information available from a vertically integrated utility. In an effort to assist the CEC in satisfying the requirements of PRC Section 25324 by consulting with transmission owners in developing its strategic transmission plan, LADWP urges the CEC to engage in an open and free exchange of ideas with each control area. To that end, LADWP extends an invitation for the CEC to meet with the LADWP staff in Los Angeles and/or Sacramento and welcomes other public power stakeholders to participate in such a meeting. LADWP looks forward to a successful dialogue and collaboration in furthering statewide electric reliability and sufficiency.

Dated: December 2, 2004

Respectfully submitted,

Randy S. Howard
Executive Assistant to the General
Manager-Power